

US EPA ARCHIVE DOCUMENT

Region 4 State/Local Modelers Workshop

Pre-Application Meeting : PSD Permitting

Kevin Davis

Division for Air Quality

Kentucky Department for Environmental Protection



To Protect and Enhance Kentucky's Environment

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Meeting Recommendations

- **Analysis Requirements (Section 10.2.1.a of Appendix W)**

Every effort should be made by the Regional Office to meet with all parties involved in either SIP revision or a PSD permit application prior to the start of any work on such a project. **During this meeting a protocol should be established between the preparing and reviewing parties to define the procedures to be followed, the data to be collected, the model to be used, and the analysis of the source and concentration data.** An example of requirements for such an effort is contained in the Air Quality Checklist posted on EPA's Internet Scram Web Site (subsection 2.3). This checklist suggests the level of detail required to assess the air quality resulting from the proposed action. **Special cases may require additional data collection or analysis and this should be determined and agreed upon at this pre-application meeting.** The protocol should be written and agreed upon by the parties concerned, **although a formal legal document is not intended.** Changes in such a protocol are often required as the data collection and analysis progresses. However, the protocol establishes a common understanding of the requirements.



Pre-Application Meeting

- **Highly recommended prior to submitting the permit application and modeling protocol**
- **Increases the probability of a complete application submission and limits potential time consuming hurdles**
- **Assists permit applicants, required to perform compliance demonstrations of air quality impacts from new and modified sources, in protection of public health/welfare and the environment**



Timeline

Depending on the working stage of the project:

- Multiple planning meetings and/or conference calls may be required in the early stages of the process
 - Several months prior to submittal
- Pre-application meeting
 - One to three months prior dependent on completion percentage of the final permit application submittal
- The modeling protocol
 - Typically valid for a period of 90 days after approval



Information Required Prior to Meeting

- **Agenda Topics**
- **Recommended Participants**
- **Meeting Locations**
- **Modeling Protocol**



Agenda Topics

Applicant should submit the agenda to the regulatory authority at least one week prior to the meeting

– Sample agenda topics:

- **Introduction**
- **Company overview**
- **Proposed project scope**
- **Preliminary project schedule**
- **Pollutants**
- **Air quality modeling and monitoring**
- **Recent regulatory changes**
- **Regulatory applicability**
- **Agency feedback**



Meeting Participants

- Attendance of participants should be based on the applicant's agenda
- Recommended participants:
 - Applicant's personnel/project engineers, environmental consultant
 - Regulatory authority
 - Permit supervisor
 - Permit writer
 - Compliance staff
 - Legal Staff
 - Regional Administrator and Federal Land Manager



Meeting Location

- **Advantages and disadvantages with choice of meeting location**
 - **Regulatory authority office**
 - **The applicant's facility**
 - **Alternative location**



Modeling Protocol

- **Most effective when submitted prior to modeling demonstration**
 - Decreases misunderstandings
 - Avoid delays in the permit process
- **The Protocol should:**
 - Include requirements and recommendations from state/federal regulations and air quality modeling guidelines
 - Document in detail the modeling analysis and the presentation of results
- **Approval of the modeling protocol should not limit the scope of the modeling compliance demonstration required for the project**



Modeling Protocol Checklist

- **Elements to be addressed in the modeling protocol:**
 - **Project description, proposed model(s), proposed project parameters**
 - **Pollutants**
 - **Meteorology**
 - **Receptor network and property boundaries**
 - **Terrain**
 - **Preconstruction monitoring**
 - **Significant impact area**
 - **Preliminary/ full impact analysis/ NAAQS and PSD increment analysis**
 - **Background concentration and offsite inventories**
 - **Offsite source inventories**
 - **Class I area impact analysis**
 - **Additional impact analysis**
 - **Secondary analysis/ Case by case justifications/ non default options**

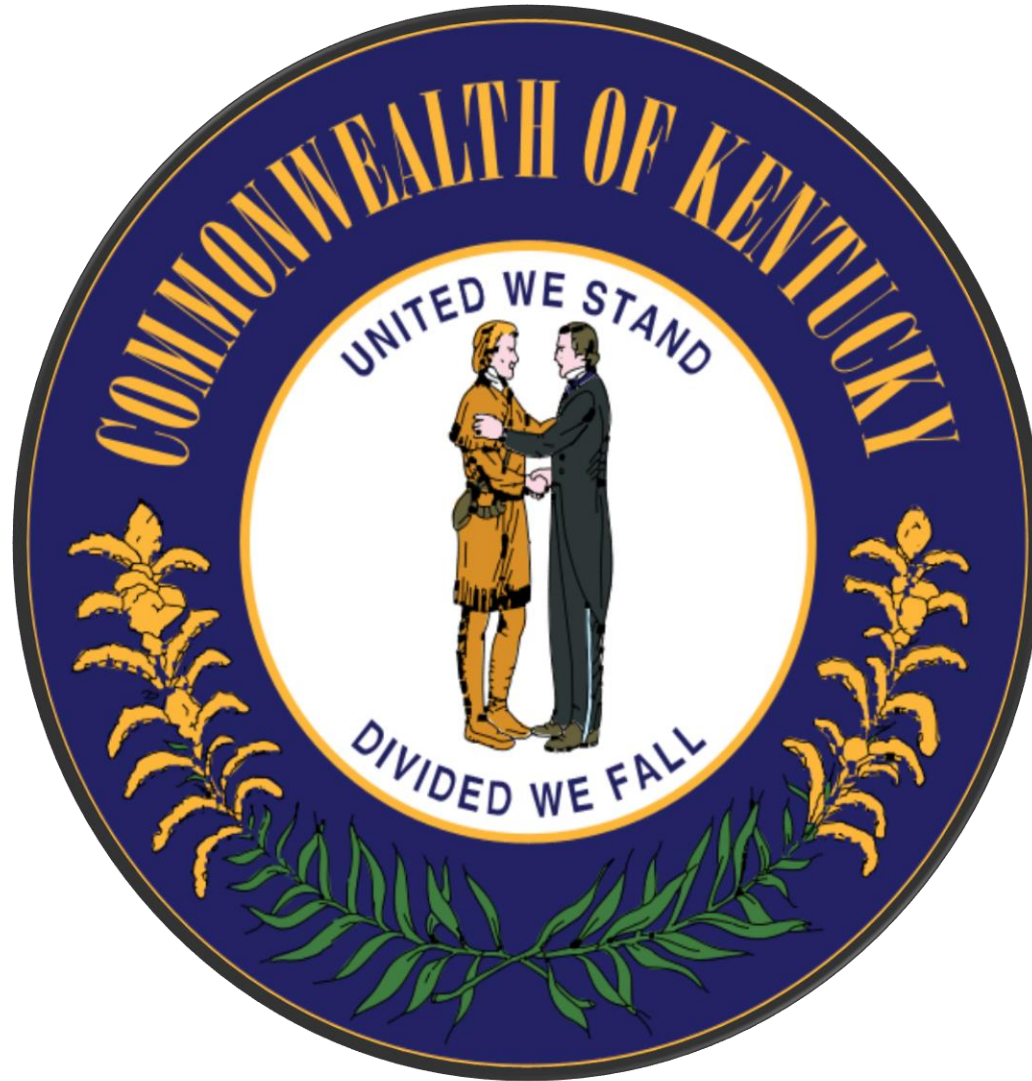


Avoid the Pitfalls

- **Establish the line of communication between applicant and regulatory authority to promote a complete application submittal for review**
- **Provide guidance to the applicant of suggested regulatory changes and potential hurdles**
- **Reduce the need for additional information requests**
- **Streamline the entire permitting process to manage the regulatory time frame**



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Questions?

Contact Information:

Kevin Davis

Kentucky Division for Air Quality

200 Fair Oaks Lane, 1st Floor

Frankfort, KY 40601

kevin.davis@ky.gov

502-564-3999

